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**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Robert P. Milani, et al. v. City of New York,  
25-CV-1732 (DLC)(KHP)

Dear Judge Cote:

I am an attorney in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. I submit this letter, in accordance with Sections 1(A), (D) of Your Honor's Individual Practices in Civil Cases, on behalf of Defendant City of New York to seek additional time to respond to the Complaint.

The nine Plaintiffs bring this action to assert Second Amendment claims with respect to the length of the New York City Police Department License Division's approval process for their handgun licenses. Specifically, Plaintiffs argue that the License Division's delays in processing firearm license applications are "excessive, unreasonable, and unjustifiable." Docket Entry No. 5, Complaint at ¶ 1. Plaintiffs ask the court to award them compensatory damages and attorneys' fees.

The Complaint is very detailed as it contains 510 paragraphs that span one hundred pages. The Complaint discusses the license application process for the nine individual plaintiffs and also contains facts regarding numerous other applicants who are not a party to the case. As such, the Complaint requires further extensive investigation in order to fully respond.

For all these reasons, the City requests that its time to respond to the Complaint be extended by sixty days, or until May 24, 2025. This is the first such request and is consented to by counsel for Plaintiffs. As the proposed new date does not impact any other schedule, I request that the Court approve such extension.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

/s/

Nicholas Ciappetta  
Senior Counsel